

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION

Crystal Manning As Next Friend of	§	
L.D., a Minor, Mariahlee Mansaw As	§	
Next Friend of P.M., a Minor, Melissa	§	
Hollins As Next Friend of D.H., a Minor, As	§	
Wrongful Death Beneficiaries of Billie	§	
Davis, Deceased, and Ruby Lee Davis,	§	
Individually and as Representative of The	§	
Estate of Billie Davis, Deceased,	§	
	§	
Plaintiffs,	§	
	§	
vs.	§	Case No. 4:23-cv-01115
	§	
LASALLE CORRECTIONS LLC d/b/a	§	
LASALLE CORRECTIONAL CENTER,	§	
HARRIS COUNTY, and HARRIS	§	
COUNTY SHERIFFS OFFICE,	§	
	§	
Defendants.	§	

**CERTIFICATE OF SERVICE**

The undersigned attorney of record for LaSalle Correctional Center, L.L.C. certifies that on November 4, 2024, Defendant served the following discovery responses:

1. Defendant LaSalle Correctional Center, L.L.C.'s Objections and Responses to Plaintiffs' First Requests for Production.

The undersigned also sent correspondence to Plaintiffs' counsel on November 4, 2024 objecting to the jurisdictional discovery directed to Southwestern Correctional, LLC because it has not appeared yet in this matter and because it is a Texas company that has not asserted any challenge to personal jurisdiction. The undersigned sent correspondence to Plaintiffs' counsel on November 8, 2024 objecting to the jurisdictional discovery directed to LaSalle Management Company, LLC because it also has not appeared yet in this matter.

Respectfully submitted,

**HORNE ROTA MOOS, LLP**

By: /s/ Marvin C. Moos

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ATTORNEY-IN-CHARGE FOR  
DEFENDANT LASALLE  
**CORRECTIONAL CENTER, L.L.C.**

**CERTIFICATE OF SERVICE**

I hereby certify that on **November 8, 2024**, I electronically served this document on all the following counsel:

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**Heidi O. Vicknair**  
**Clayton S. Quinn**  
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*Attorneys for Harris County*

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*/s/ Marvin C. Moos*  
MARVIN C. MOOS